STATEMENT OF BASIS FOR STATE WASTE DISCHARGE PERMIT ST- 6203
OLDCASTLE GLASS INC.

FACILITY GENERAL INFORMATION:

Applicant	Oldcastle Glass Inc.
Facility Name and Address	Oldcastle Glass Vancouver 1611 S.E. Commerce Avenue Battle Ground, WA 98604
Industry Type	(Flat) Glass Products, Made of Purchased Glass
Facility Discharge Location	Latitude: 45° 21.633' N Longitude: 122° 38.286' W
Publicly Owned Treatment Works (POTW)	Clark Regional Wastewater District (CRWWD) and Salmon Creek Wastewater Treatment Plant
Contact at Facility	Name: Bruce Steffens Telephone #: (360) 816-7777

BACKGROUND INFORMATION

On August 21, 2008, the Department of Ecology (Ecology) received the following request from Don Young, CRWWD Pretreatment Coordinator:

> *In accordance with WAC 173-220-190 Modification and revocation of permit.*
>
> *The city of Battle Ground and Clark Regional Wastewater District would like to request a permit modification of State Waste Discharge Permit Number ST 6203. The permit was issued to Old Castle Glass in Battle Ground, Washington on October 24, 2007.*
>
> *The requested modification is for the pH monitoring method. Presently permit number ST 6203 requires Old Castle Glass to monitor the industrial wastewater discharge from its facility continuously. There are two primary concerns with continuous monitoring of the wastewater from Old Castle Glass's industrial process. One is the monitoring site is located at the last manhole in the facility's sewer system, and the wastewater from Old Castle Glass's industrial process mixes with sanitary sewage from the facility's restrooms and lunch room prior to reaching the monitoring site. Solid material from the sanitary sewage hangs up on the pH probe and blinds the probe giving a false pH reading. Old Castle Glass has appeared to solve this problem by manually cleaning the probe several times per day. The probe does not appear to be affected by the solid material to the degree it was prior to the cleaning procedures implementation.*
>
> *The other concern which is more difficult to resolve are the long periods of non-discharge of either industrial wastewater or domestic sanitary wastewater. During the time wastewater is not discharging from the facility the pH probe dries out and begins to give a false reading. Although concurrent flow monitoring data can show clearly that no discharge is occurring during the period of false readings the data also shows that once discharge begins again the probe is very slow to recover and respond properly. The false readings can continue for several hours after discharge resumes. Discharge from the facilities pretreatment system is erratic and generally unpredictable thus we believe it would place an onerous burden on Old Caste Glass staff to attempt to determine periods of non-discharge and take steps to protect the pH probe. Staff cannot adequately predict when flow will cease or when flow will resume in order to prevent the pH probe drying out and failing to function properly.*

> *The city of Battle Ground and the Clark Regional Wastewater District Pretreatment Program requests that the wastewater discharge monitoring method for Permit Number ST 6203 be modified to replace continuous pH monitoring with grab sample pH monitoring. We feel that based on the current consistent nature of the constituents of the discharge that grab sample monitoring would adequately protect the POTW and environment. We propose to perform additional oversight from time to time to confirm compliance.*

Ecology has reviewed Mr. Young's request and concurred that the pH grab sample monitoring would adequately protect the POTW and environment. Oldcastle Glass waste discharge permit is modified accordingly.